



August 29, 2005

Mr. Don Hultman  
Refuge Manager  
Upper Mississippi River National Wildlife and Fish Refuge  
U.S. Fish & Wildlife Service  
51 East Fourth Street,  
Winona, MN 55987

Mr. Hultman:

On behalf of the 550,000 members of BASS, the following are the comments of BASS/ESPN-Outdoors regarding the draft Comprehensive Conservation Plan and Environmental Impact Statement (CCP/EIS) for the Upper Mississippi River National Wildlife and Fish Refuge (Refuge). Comments from BASS-affiliated Federations at the state level may be submitted separately.

Given the 1990 Memorandum of Agreement between the U.S. Fish and Wildlife Service (FWS) and BASS regarding recreational fishing on refuges, as well as our substantive concerns regarding a 2001 proposal to prohibit tournament fishing on refuges (that was subsequently abandoned), we are concerned that once again the FWS and National Wildlife Refuge System are embarking on ways to reduce or eliminate fishing on refuges.

We are further concerned by the fact that, very late in the game, we are being asked to comment on a draft CCP and Environmental Impact Statement (EIS) without all the alternatives. Therefore, these comments are to be considered general and provisional until we have the opportunity to review the new "Alternative E" which will be issued in October according to your July news release.

Statements in the CCP/EIS regarding fishing in general, and tournament fishing specifically, are confusing, generalized and not supported by fact or data. While you say that fishing is an important priority public use on the Refuge, throughout the document you discriminate between "fishing" and "tournament fishing." Why would you want to "maintain and improve" the sport by improving habitat and support facilities (Summary EIS, pg. xviii), and then deny access for tournament fishing (Summary EIS, pg. xix). You offer no proof of conflict with other anglers and small craft users. Nor is there supporting information of habitat damage and fish and wildlife disruption in shallow backwaters areas from tournament boats, which navigate these areas with electric trolling motors.

To justify a Refuge tournament permitting process, the EIS states that that oversight is needed to coordinate timing and spacing of tournaments with the states. I will remind



P.O. Box 10000 • Lake Buena Vista, FL 32830  
407-566-BASS • Fax 407-566-2072  
conservation@bassmaster.com



you that in March 2001, the Illinois Department of Natural Resources sent a letter to the FWS regarding the proposed tournament ban refuge-wide, stating "The Illinois Department of Natural Resource is strongly opposed to a tournament ban" and went on to say that they consider tournament fishing "an integral part of refuge activities in Illinois." Therefore, it would seem that Objective 4.9 of Alternative D, the preferred Alternative, which proposes that the Refuge play a coordination role in tournament permitting, given the interstate nature of the Refuge and river, is inappropriate. The EIS goes further to suggest that the Corps of Engineers be involved in this multiple permitting process to the point of defining "what constitutes a fishing tournament," adding just layer upon layer of government permitting to further discourage tournament fishing.

I am the first to admit that I understand the complexities of managing a refuge with many purposes and potentially conflicting uses, especially when waterfowl management is a key one of them. BASS has no problems with proposed closures of key waterfowl areas during times vital to their use. However, the CCP/EIS continues to confuse the reader in this regard. It states that "Despite a 60 percent increase in boating traffic from 1986 to 1997, lake-wide disturbance rate (of waterfowl), were comparable to 1981 levels. (DEIS, pg 194) Although only one-third of the observed intrusions into the voluntary waterfowl avoidance areas (VWAA) were by anglers and commercial fisherman, the EIS proposes to single out fishing as the culprit. If in fact, as the document contends, boat traffic attendant to tournament fishing is creating issues in waterfowl management, would it not make more sense to increase enforcement in VWAAAs?

The EIS proposes to cut back on areas of boating access for fishing, specifically with bass boat, however, the data in the EIS indicates that bass boats are not the most common boat type in River Pools 4-9 during the summer. There is no rationale given as to why then tournaments are targeted to reduce boat traffic, other than the subtle inferences that they are noisy and run to fast. Many types of boats and personal watercraft run at high speeds and create noise, but do not seem to be targeted for reduced use by the EIS.

Section 3.2.9.1 of the EIS states that tournaments are increasing and "may" put extra pressure on local fish populations (page 201). Page 233 of the DEIS states that the exact number of fishing tournaments are unknown, but the document goes on to state that there are few restrictions to lessen the biological impacts from tournaments. No where in the document is there any evidence that in fact there are any biological impacts from tournaments. In fact, the EIS admits that there is no fisheries biologist on the Refuge, and that coordination with the FWS Fisheries Assistance Office in LaCrosse is little to none. However, on page 202, the EIS states that in 2004 the Upper Mississippi River Conservation Commission stated that "it appears that largemouth bass are not being over-harvested, except possibly during the winter," when tournament fishing does not occur. We at BASS would be more than happy to provide you with information demonstrating the exceeding low post-release mortality rates from catch-and-release bass tournament fishing.

We cannot overemphasize the importance of sportfishing to this nation from all perspectives – social, economic, recreational and conservation. BASS has long been a

leader in aquatic resource conservation, and was the first to implement a formal catch-and-release fishing ethic. We lead the industry in bass tournaments fish care, practiced both at all our professional tour events down through all our BASS Federation chapter and state events. Your own statistics support the importance that sportfishing on the Refuge provides, including a \$250 million industry river-wide. Further, recent creel surveys are cited showing that largemouth bass ran second to fifth in numeric harvest with 87% catch-and-release (all BASS tournaments are catch-and-release).

We would encourage the Refuge planning staff to go back and take a serious look at the proposal to decrease and multiple-permit fishing tournaments on the Refuge. We hope that the new Alternative E is more realistic.

We look forward to providing further comment on the EIS/CCP once we have all the information before us.

Sincerely,

A handwritten signature in black ink, reading "NoREEN Clough". The signature is written in a cursive style with a large, stylized "N" and "C".

NOREEN K. CLOUGH  
Conservation Director  
BASS/ESPN Outdoors

Cc: Illinois, Wisconsin, Minnesota, Iowa BASS Federation Conservation Directors